

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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CHAUNCEY GIRARD,

9:22-CV-0339

*Plaintiff,*

AJB/TWD

-against-

ST. LOUIS, et al,

*Defendants.*

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**DEFENDANTS' PROPOSED SPECIAL INTERROGATORIES  
CONCERNING QUALIFIED IMMUNITY**

Defendants submit these Proposed Special Interrogatories—each to be presented in “Yes/No” format—for the Jury’s consideration so that the Court may rule, as a matter of law, whether Defendant is entitled to qualified immunity:

**1) Defendant Joseph St. Louis**

Did Defendant St. Louis prove by a preponderance of the evidence that:

1. When Defendant St. Louis first encountered Plaintiff in the bathroom on July 11, 2021 that he found Plaintiff on the floor with an injury to his right eye?

Yes \_\_\_\_\_ No \_\_\_\_\_

2. When Defendant St. Louis first encountered Plaintiff in the bathroom, Plaintiff was by himself?

Yes \_\_\_\_\_ No \_\_\_\_\_

3. Defendant St. Louis did not use any physical force against Plaintiff on July 11, 2021?

Yes \_\_\_\_\_ No \_\_\_\_\_

**2) Alan Gonyea**

Did Alan Gonyea prove by a preponderance of the evidence that:

1. Plaintiff initially reported to Defendant Gonyea that he slipped and fell in the bathroom on July 11, 2021?

Yes\_\_\_\_\_ No\_\_\_\_\_

2. Plaintiff reported to Defendant Gonyea during an interview that he slipped and fell in the bathroom on July 11, 2021?

Yes\_\_\_\_\_ No\_\_\_\_\_

3. Defendant Gonyea did not use any physical force against Plaintiff on July 11, 2021?

Yes\_\_\_\_\_ No\_\_\_\_\_

**3) Edward Hoit**

Did Edward Hoit prove by a preponderance of the evidence that:

1. Defendant Hoit did not use any physical force against Plaintiff on July 11, 2021?

Yes\_\_\_\_\_ No\_\_\_\_\_

2. Defendant Hoit was not in the K-2 dormitory or bathroom on July 11, 2021?

Yes\_\_\_\_\_ No\_\_\_\_\_

Dated: Albany, New York  
July 7, 2025

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